

Management of Quality Assurance Requirements and Description (QARD) Revisions

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Management of QARD Revisions

Issue

DOE SNF sites have implemented the DOE/RW-0333P QARD at various revision levels

- Justifications for implementing current QARD revisions at the respective SNF sites are inconsistent. This could be viewed as taking exception to QARD requirements without adequate justification**
- A definitive policy has not been established for the implementation of QARD changes**
- RW has issued a deficiency report to the NSNF Program addressing this issue**



Management of QARD Revisions

Requirements

- The EM/RW MOA for Acceptance of DOE Spent Nuclear Fuel and High-Level Radioactive Waste (Section I, C) “Other documents (including amendments and revisions thereto) required for implementation of this MOA are:
 3. The OCRWM Quality Assurance Requirements and Description document (QARD) (DOE/RW-0333P)”
- QARD, Section 2.2.1.B.4 states: “Each Affected Organization shall review revisions to the QARD and incorporate changes into their implementing documents, as appropriate”



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Discussion

- Several revisions to the QARD have been issued since the NSNF QA program was accepted by RW
- The latest revision (10) of the QARD is the only NRC approved revision, if NSNF EM and EM sites do not work to the latest QARD revision, the OCRWM program commitment to the NRC is not being met
- Implementing QARD revisions prior to final licensing introduces elements of cost and technical risk



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Discussion

- **Not implementing QARD revisions introduces the risk that EM SNF will not be accepted by RW for disposal without additional mitigating actions**
- **The basis for remaining at previous QARD revisions has not been supported by technical justification(s)**

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Discussion

- **SNF site justifications for not incorporating QARD revisions are generalized as follows:**
 1. **Changes require a modification to the M&O/M&I contract**
 2. **Cost of implementation is prohibitive**
 3. **HLW programs at the site share common procedures and HLW programs do not incorporate QARD revisions**
 4. **Until the final repository license basis is established, incremental changes to the QARD should not be implemented**

Neither the QARD or the RW/EM MOA allows Items 1 thru 4 as justifications to work to QARD revisions other than the current revision



Management of QARD Revisions

Recommendations

1. RW perform initial screening of QARD revisions and identify changes affecting only OCRWM activities
2. EM SNF sites implement the most current QARD revision as they become effective or provide technical justification for not implementing revisions
3. Retain justification documents and NSNF QA/OCRWM OQA concurrence letter as objective evidence for not revising SNF Site matrices
4. Document this approach in each respective NSNF/RW and NSNF/SNF MOA



Management of QARD Revisions

Summary

- Clarification of the site(s) requirement to incorporate QARD revisions would benefit final disposition of EM SNF
- The existing policies do not provide assurance that EM SNF activities are appropriately performed as QARD revisions are issued
- The actions recommended here will enhance confidence that EM SNF will meet QA requirements and be accepted by RW for disposal

